



October 30, 2019

BY ECF

The Honorable LaShann DeArcy Hall
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Ira Kleiman et al. v. Craig Wright*, No. 1:19-mc-02303-LDH (E.D.N.Y.)

Dear Judge DeArcy Hall:

We act as counsel for Plaintiffs in the above captioned matter and are writing to request a 30-day extension to respond to Brendan Sullivan's Motion to Quash. Mr. Sullivan, through his counsel, has consented to this request.

Plaintiffs seek an extension because discovery is similarly postponed in the underlying litigation while the parties finalize a nonbinding agreement in principle to settle this matter. *See* Order, ECF No. 289, No. 9:18-cv-80176, *Kleiman v. Wright* (S.D. Fla. Oct. 9, 2019). Discussions to finalize the settlement remain ongoing. If successful, the subpoena Mr. Sullivan seeks to quash will become moot. Thus, there is good cause for an extension in order to potentially avoid unnecessary litigation. FED. R. CIV. P. 6(b)(1).

Plaintiffs have previously requested two extensions of time, which the court granted on September 19 and October 9, 2019. The current deadline for Plaintiffs to respond is October 31, 2019. This extension will not affect any other scheduled dates.

Sincerely,

/s/ Joseph Delich
Joseph Delich
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